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6 Attorneys for Defendant  
7 SUSAN POLGAR

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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA CHESS  
13 FEDERATION, an Illinois non-for profit  
14 corporation, RANDALL D. HOUGH, an  
individual,

15 Plaintiffs,

16 vs.

17 SUSAN POLGAR, an individual, GREGORY  
ALEXANDER, an individual, and DOES 1-10,  
18 inclusive,

19 Defendants.  
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Case No. 3:08-cv-05126-MHP

**DECLARATION OF MATT SPRINGMAN  
IN SUPPORT OF MS. POLGAR'S REPLY  
TO PLAINTIFFS' OPPOSITION TO HER  
MOTION FOR SUMMARY JUDGMENT**

Hearing Date: July 13, 2009  
Time: 2:00 p.m.  
Courtroom: Courtroom 15, 18<sup>th</sup> Floor  
Judge: Judge Marilyn Hall Patel

1 I, MATT SPRINGMAN, declare and state as follows:

2 1. I am an attorney duly licensed to practice in the State of California and an  
3 associate in the law firm of Gonzalez & Leigh, LLP, counsel for Susan Polgar in this case. The  
4 matters set forth herein are within my personal knowledge and if called and sworn as a witness, I  
5 could competently testify thereto.

6 2. Attached as Exhibit A is a February 1, 2009 email from Susan Polgar to Jack  
7 Lemoine.

8 3. Attached as Exhibit B is a November 30 to December 1, 2007 email thread  
9 between Susan Polgar and the other members of the Executive Board.

10 4. Attached as Exhibit C is an undated email sent to several members of the  
11 Executive Board. Although the email is undated, within the email Kronenberger discusses his  
12 plan to send a letter to Paul Truong requesting information relating to Brian Mottershead's  
13 allegations. Because the letter that Kronenberger refers to was actually sent to Mr. Truong on  
14 November 29, 2007, it is apparent that the attached email predates the letter, i.e. before  
15 November 29, 2007. The letter was posted on the Google chess discussion board at  
16 <http://groups.google.com/group/rec.games.chess.politics/browse>  
17 [thread/thread/401b45c548d5860f9b80Ink=gst&q=kronenberger#9b805b3a94a5b64a](http://groups.google.com/group/rec.games.chess.politics/browse/thread/thread/401b45c548d5860f9b80Ink=gst&q=kronenberger#9b805b3a94a5b64a), but has  
18 since been removed. Ms. Polgar produced this letter to plaintiffs on May 8, 2009.

19 5. Attached as Exhibit D is a privilege logs produced by defendants in the related  
20 action in the Northern District of Texas, Case No. 5:08-cv-00169-C.

21 6. Attached as Exhibit E is a partial privilege log produced by defendants in the  
22 related action in the Northern District of Texas, Case No. 5:08-cv-00169-C.

23 7. Attached as Exhibit F is a July 28, 2009 email from an unknown person to Susan  
24 Polgar.

25 I declare under penalty of perjury, under the laws of the State of California, that the  
26 foregoing is true and correct. Executed on June 30, 2009 at San Francisco, California

27 /s/ Matt Springman  
28 MATT SPRINGMAN